

Schedule (2)(a)
Defendants' Stipulation of Uncontested Facts

***Defendants do not object to items 1-4 of Plaintiff's Statement of Uncontested Facts. However, Defendants object to the remainder of Plaintiff's Statement of Uncontested Facts insofar as they restate the allegations contained in the Complaint that Defendants contested and addressed in their Answer and Affirmative Defenses.**

1. Plaintiff is currently the Public Information Officer for New Castle County.
2. Plaintiff has held this position since October 28, 1998.
3. Plaintiff has been employed by New Castle County since September 30, 1991.
4. Defendant Christopher Coons is the County Executive of New Castle County.
5. Defendant, Guy Sapp, is the former Director of Public Safety for New Castle County.
6. At all times relative hereto, the Plaintiff was acting in his official capacity as PIO.